

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

In re:

LeClairRyan PLLC,

Debtor.

Chapter 7

Case No. 19-34574 (KRH)

Lynn L. Tavenner, as Chapter 7 Trustee,

Plaintiff,

v.

Adv. Proc. No. 20-03142 (KRH)

ULX Partners, LLC and UnitedLex
Corporation,

Defendants.

AGREED STIPULATION AND ORDER

The Parties, plaintiff Lynn L. Tavenner, as Chapter 7 Trustee (the “**Plaintiff**”) and defendants ULX Partners, LLC and UnitedLex Corporation (collectively, the “**Defendants**”), by their respective counsel, and subject to approval by the Court, stipulate and agree to the following:

1. On July 20, 2021, this Court entered an Order [Docket No. 58] requiring the Defendants to file their Answer(s) to the original Complaint [Docket No. 4] (the “**Original Complaint**”) in this matter no later than August 10, 2021 (the “**Answer Order**”).

2. On July 22, 2021, counsel for the Plaintiff informed the Defendants and this Court that the Plaintiff intends to file a Motion for Leave to File an Amended Complaint in this

matter (the “**Anticipated Motion for Leave**”) in order for such motion to be heard by this Court at the next Omnibus Hearing of August 19, 2021.

3. In light of the Anticipated Motion for Leave, the Parties agree, subject to the Court’s approval, that the Defendants’ deadline to file their answer(s) to the Original Complaint as set forth in the Answer Order is vacated and that the following shall instead apply:

- i. In the event the Plaintiff opts against filing the Anticipated Motion for Leave, then the Plaintiff shall file a Notice of Answer Deadline with the Court indicating that Defendants will file their answer(s) to the Original Complaint no later than August 24, 2021.
- ii. In the event the Plaintiff files the Anticipated Motion for Leave and the Court denies such Motion, leaving the Original Complaint as the operative complaint in this matter, then Defendants shall file their answer(s) to the Original Complaint no later than fourteen (14) calendar days after entry of the Court’s Order denying the Anticipated Motion for Leave.
- iii. In the event the Plaintiff files the Anticipated Motion for Leave and the Court grants such Motion permitting the filing of an Amended Complaint, or if Defendants and/or their counsel consent in writing to the relief requested in the Anticipated Motion on or before August 5, 2021 (the “**Written Consent**”), then Defendants shall file (i) their answer(s) to the Amended Complaint or (ii) any other response to the Amended Complaint as permitted by the Bankruptcy Code, any rule, statute, or as otherwise authorized by the Bankruptcy Court, no later than twenty-one (21) calendar days after either the entry of the Court’s

Order granting the Anticipated Motion for Leave or the Written Consent, or by
such other time as may be ordered by the Court.

Dated: July 30, 2021

Respectfully submitted,

/s/ Thomas J. McKee, Jr.
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and

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Counsel to Defendants

SO ORDERED, this _____ day of _____, 2021:

THE HONORABLE KEVIN R. HUENNEKENS
UNITED STATES BANKRUPTCY JUDGE

LOCAL BANKRUPTCY RULE 9022-1(C) CERTIFICATION

I hereby certify that the foregoing has either been endorsed by or served upon all necessary parties.

/s/ Thomas J. McKee, Jr.

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